

1 Honorable John C. Coughenour  
2  
3  
4  
5  
6  
7  
8

9 UNITED STATES DISTRICT COURT, WESTERN DISTRICT OF WASHINGTON  
10 AT SEATTLE

11 ALEXANDER SERRA, M.D.,

12 Plaintiff,

13 No. C 05-0827 JCC

14 v.

15 CENTER FOR DIAGNOSTIC IMAGING,  
16 INC., a Minnesota corporation; CDI  
17 MANAGEMENT CORP., a Minnesota  
corporation; ONEX, INC., a Canadian  
corporation; DON JACOBSEN, an individual;  
TOM TOMLINSON, an individual; and  
ROBERT BAUMGARTNER, an individual,

18 Defendants.

19 STIPULATION OF DISMISSAL WITH  
20 PREJUDICE, PURSUANT TO FED. R.  
21 CIV. P. 41(a)(1)(ii), AND [PROPOSED]  
22 ORDER THEREON

23 Pursuant to Rule 41(a)(1)(ii) of the Federal Rules of Civil Procedure, IT IS  
24 HEREBY STIPULATED between the parties, by and through their respective counsel of record,  
25 based upon the Confidential Settlement Agreement and Mutual Release effective July 5, 2005,  
that the claims of plaintiff Alexander Serra, M.D., asserted against defendants Center for  
Diagnostic Imaging, Inc., CDI Management Corp., Onex, Inc., Don Jacobsen, Tom Tomlinson  
and Robert Baumgartner in the above-captioned action, shall be and are hereby DISMISSED  
with prejudice, AND THAT all parties shall bear their own costs and attorneys' fees.

26  
27 STIPULATION OF DISMISSAL AND  
[PROPOSED] ORDER  
Case No. C05-0827 JCC

- 1 -



28 HAGENS BERMAN  
29 SOBOL SHAPIRO LLP

30 1301 FIFTH AVENUE, SUITE 2900 • SEATTLE, WA 98101  
31 TELEPHONE (206) 623-7292 • FACSIMILE (206) 623-0594

1 Date: August 3, 2005

HAGENS BERMAN SOBOL SHAPIRO LLP

2 By /s Jeffrey T. Sprung  
3 Jeffrey T. Sprung, WWSA #23607  
4 1301 Fifth Ave., Suite 2900  
5 Seattle, WA 98101  
6 Telephone: 206-623-7292  
7 Facsimile: 206-623-0594

8 Timothy T. Scott  
9 SIDLEY AUSTIN BROWN & WOOD LLP  
10 555 California Street  
11 San Francisco, CA 94104  
12 Telephone: 415-772-1296  
13 Facsimile: 415-772-7400

14 Attorneys for Plaintiff

15 GARVEY SCHUBERT BARER

16 By /s David Lieberworth  
17 David Lieberworth, WWSA #9329  
18 1191 Second Ave., 18<sup>th</sup> Floor  
19 Seattle, WA 98101  
20 Telephone: 206-464-3939  
21 Facsimile: 206-464-0125

22 Attorneys for Defendants

23 **IT IS SO ORDERED.**

24 Dated: \_\_\_\_\_

25 By: \_\_\_\_\_  
26 Hon. John C. Coughenour  
United States District Judge

STIPULATION OF DISMISSAL AND  
[PROPOSED] ORDER  
Case No. C05-0827 JCC

- 2 -



HAGENS BERMAN  
SOBOL SHAPIRO LLP

1301 FIFTH AVENUE, SUITE 2900 • SEATTLE, WA 98101  
TELEPHONE (206) 623-7292 • FACSIMILE (206) 623-0594